



Graves Garrett LLC

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June 26, 2019

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
Courtroom 14A
500 Pearl Street
New York, New York 10007

Re: *Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC*, 18-cv-2185 (JGK)

Dear Judge Koeltl:

Today, I noticed an appearance as counsel for Defendant/Counterclaimant Strategic Vision US, LLC in the above-referenced action. I write seeking the Court's instruction regarding the hearing currently set for Friday, June 26, 2019, at 2:30 p.m., upon the Order to Show Cause as to Barton LLP's Motion to Withdraw (Doc. 106).

Later this evening or early tomorrow morning, we intend to file a stipulation signed by all necessary parties to a Consent Order of Substitution. We believe this will moot the Show Cause motion and avoid the necessity of appearances by a client representative of Strategic Vision and of Barton LLP, which had been discharged and moved to withdraw.

Meanwhile, I have been in contact with counsel for Plaintiff/Counterclaim Defendant Eastern United regarding other matters of immediate concern. These include pleading and discovery deadlines, mediation dates, and the pre-motion conference that was to have occurred this Friday in advance of the stay. I conveyed a specific scheduling proposal to opposing counsel earlier today just before entering my appearance, but there has scarcely been time for counsel to confer with his client or report back to me, and I am not certain that we will have fully exchanged views over the next 48 hours.

Regardless, although we just appeared in this case today, we could be available on Friday for the 2:30 p.m. setting that had been reserved for the Show Cause hearing. The Court may well want to instruct all counsel to come prepared to discuss case scheduling. If that is the Court's intent, we will appear and use the intervening day to continue our review of the available materials and prepare ourselves for a conference, as



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well as for the pre-motion conference (Doc. 104). Alternatively, we are available any other business day over the next three weeks, excepting July 5 and July 19, 2019, and candidly, a few additional days would allow us to more fully prepare.

Although we believe significant discovery remains to be completed, necessitating some enlargement of the current deadline of July 15, 2019, it is our desire to work with the Plaintiff and third-party witnesses to complete discovery expeditiously and prepare this case for disposition. As a first step, Strategic Vision can be prepared to file a response to the Second Amended Complaint (due June 14, 2019, before this case was stayed) on or before Friday, July 19, 2019. We also look forward to resuming the discussions prior counsel had initiated with Magistrate Judge Freedman.

We apologize for the late hour of this letter but are available at any time over the next 48 hours to answer any other inquiries the Court may have, and will look forward to the Court's instructions regarding this Friday's setting.

Respectfully submitted,

Edward D. Greim

Counsel for Defendant/Counterclaim Plaintiff
Strategic Vision US, LLC

cc: Counsel of record via ECF